

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

DAVID BISHOP, Individually and on Behalf
of All Others Similarly Situated,

Plaintiff,

v.

MAXIMUS FEDERAL SERVICES, INC.,

Defendant.

Case No.: 1:23-cv-01019

LINDEN BUZZELL, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

MAXIMUS INC. and MAXIMUS FEDERAL
SERVICES, INC.,

Defendants.

Case No.: 1:23-cv-01028

CARLOS HARDING, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

MAXIMUS INC. and MAXIMUS FEDERAL
SERVICES, INC.,

Defendants.

Case No.: 1:23-cv-01045

CLIFFORD BEERS and WADE NUGENT,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

MAXIMUS INC. and MAXIMUS FEDERAL
SERVICES, INC.,

Defendants.

Case No.: 1:23-cv-01107

ALEXYS TAYLOR, on behalf of herself and
all others similarly situated,

Plaintiff,

v.

MAXIMUS INC.,

Defendant.

Case No.: 1:23-cv-01117

LEO WILT, individually and on behalf of all
others similarly situated,

Plaintiff,

v.

MAXIMUS INC.,

Defendant.

Case No.: 1:23-cv-01108

STIPULATED MOTION FOR CONSOLIDATION

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

NOTICE IS HEREBY GIVEN that Defendants Maximus Inc. and Maximus Federal

Services, Inc. (“Maximus” or “Maximus Defendants”), by and through undersigned counsel respectfully move for consolidation of the above-captioned cases for both pre-trial and trial purposes pursuant to Federal Rule of Civil Procedure Rule 42(a), and in support thereof submit its accompanying brief. Plaintiffs do not oppose this request for consolidation.

Dated: August 29, 2023

Respectively Submitted,

/s/ Jon M. Talotta

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Maximus Federal Services, Inc.*

CERTIFICATE OF CONFERENCE

I HEREBY CERTIFY that, on August 29, 2023, counsel for Maximus Defendants conferred with counsel for Plaintiffs by videoconference and e-mail to discuss the matters raised herein. On August 29, 2023, the parties exchanged drafts/redlines of this Motion by e-mail. Counsel for Plaintiffs consent to this Motion.

/s/ Jon M. Talotta

Jon M. Talotta (VSB No. 44590)